

E-FILED ON 1/4/10

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Attorneys for Plaintiff Lisa Poulin, Trustee for  
USA Investment Partners, LLC

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEVADA**

In re:  
  
USA INVESTMENT PARTNERS, LLC  
  
Debtor.

Case No.: 07-11821-LBR  
Chapter 11

Adv. No.: 09-01251-LBR

LISA M. POULIN, the Chapter 11 trustee of  
USA Investment Partners, LLC

Plaintiff,

v.

JEFFREY E. FROMBERG, d/b/a THE LAW  
OFFICES OF JEFFREY E. FROMBERG

Defendant.

**FIFTH STIPULATION EXTENDING  
DEADLINE TO FILE ANSWER TO  
COMPLAINT**

**Scheduling Conference**

Date: February 5, 2010  
Time: 9:30 a.m.

IT IS HEREBY STIPULATED and AGREED, by and between Lisa M. Poulin ("Trustee"), the Chapter 11 trustee for USA Investment Partners, LLC ("USAIP"), by and through her counsel, the law firm of Gordon Silver, and Jeffrey E. Fromberg d/b/a The Law Offices of Jeffrey E. Fromberg ("Defendant," and together with Trustee, the "Parties"), by and through his counsel, the law firm of Best Best & Krieger as follows:

WHEREAS Trustee has sought the avoidance and recovery of certain transfers tendered by USAIP to Defendant in the amount of \$252,898.33 pursuant to, *inter alia*, 11 U.S.C. §§

1 548(a)(1) and/or 544(b)(the "Transfers"); and

2 WHEREAS Trustee and Defendant are currently involved in settlement negotiations; and

3 WHEREAS to preclude the unnecessary incurrence of fees and costs while settlement  
4 negotiations are pending, Trustee has agreed to allow Defendant a fifth extension of the deadline  
5 to file his answer in the above-captioned adversary proceeding; and

6 WHEREAS such extension will not require a continuance of the Scheduling Conference  
7 set by the Court for February 5, 2010.

8 NOW, THEREFORE, the Parties hereby stipulate and agree as follows:

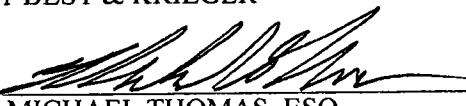
9 1. Defendant shall have up to and including January 19, 2010 to file his Answer in the  
10 above-referenced adversary proceeding.

11 DATED this 31<sup>st</sup> day of December, 2009.

12 GORDON SILVER

BEST BEST & KRIEGER

13  
14 By: GREGORY E. GARMAN, ESQ.  
15 TALITHA B. GRAY, ESQ.  
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14 By:   
15 MICHAEL THOMAS, ESQ.  
16 3750 University Avenue, Suite 400  
17 Riverside, California 92505-1028  
18 Attorneys for Jeffrey E. Fromberg d/b/a  
19 The Law Offices of Jeffrey E. Fromberg

1 548(a)(1) and/or 544(b)(the "Transfers"); and

2 WHEREAS Trustee and Defendant are currently involved in settlement negotiations; and

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4 negotiations are pending, Trustee has agreed to allow Defendant a fifth extension of the deadline  
5 to file his answer in the above-captioned adversary proceeding; and

6 WHEREAS such extension will not require a continuance of the Scheduling Conference  
7 set by the Court for February 5, 2010.

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10 above-referenced adversary proceeding.

11 DATED this 31 day of December, 2009.

12 GORDON SILVER

BEST BEST & KRIEGER

13  
14 By: Teresa Kpata  
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21 USA Investment Partners, LLC  
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